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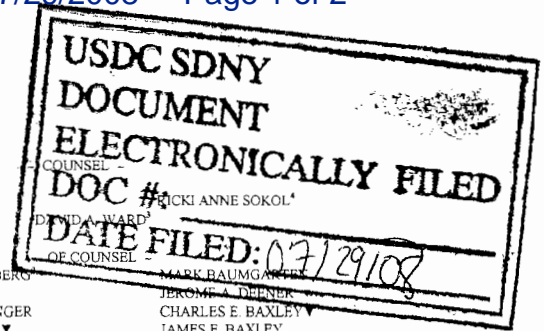
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July 25, 2008

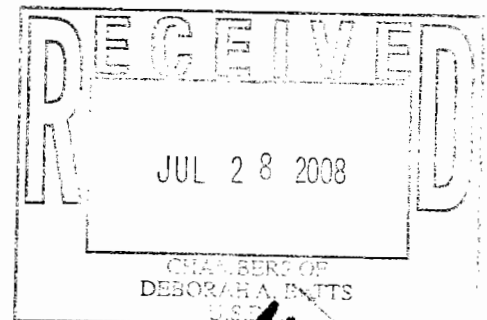
Federal Express

Honorable Deborah A. Batts, U.S.D.J.
 United States Courthouse
 500 Pearl Street, Room 2510
 New York, NY 10007

Re: A-Del Construction Corp., et al
 vs: Metropolitan Life Insurance Company, et al
 Civ. No. 07 CIV 9324

Dear Judge Batts:

We write to advise the Court of the status of service upon all parties and their appearances in this matter. We have served the Summons and Complaint upon defendant Richard Wezner and the entities he controls (defendants United Group Programs, PLR Management Co., LLC, and Medical Benefit Administrators). We have been in contact with counsel who may be representing Wezner and his entities and we expect that they will be entering an appearance shortly. At that time, we will confer with Wezner's counsel to determine whether we can come to an agreement as to certain other procedural matters, including the claims against Manulife Financial Corporation and the claims against Donald F. Neuhaus and the entity that he controlled (defendant American Financial Services, Inc.). In order to permit Wezner's counsel the opportunity to enter an appearance and review our proposal, we respectfully request that the Court extend the time within which Manulife must answer or appear, so that we can work to resolve those claims and simplify this matter without Manulife incurring the expense of filing an answer or motion.



MEMO ENDORSED

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We enclose a propose form of Order that will extend the time within which Manulife must answer or otherwise appear for 30 days. The Court has granted Manulife's requests for four previous extensions, which have been necessary to avoid the need to file a motion related to plaintiffs' claims. We expect that with this final extension, the parties will be able to resolve these issues and avoid unnecessary motion practice.

Respectfully,

David A. Ward

Enclosure

cc: Andrew O. Bunn, Esq. (by email)
Neil Merkel, Esq. (by email)
Robert Schumacher, Esq. (by email)

SO ORDERED

Deborah A. Batts

**DEBORAH A. BATTS
UNITED STATES DISTRICT JUDGE**

MEMO ENDORSED

DAB/ granted 07/29/08

MEMO ENDORSED